UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: **Belinda Crawley** : CHAPTER 13

•

:

DEBTOR : BANKRUPTCY NO.: 19-15142\AMC

AMENDED MOTION TO MODIFY DEBTOR'S CHAPTER 13 PLAN AFTER CONFIRMATION

The motion to modify of the above-named Debtors, respectfully represents:

- 1. This case was commenced by the filing on <u>October 15, 2019</u>, a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.
- 2. Scott Waterman, Esquire has been appointed Chapter 13 Trustee.
- 3. Debtor's modified plan was confirmed May 30, 2020.
- 4. Debtor have paid the sum of §5,699.00.00 into the plan.
- 5. Debtor requests permission to modify said plan.
- 6. <u>Debtor's financial circumstances have been negatively impacted by the uncertainty of the pandemic.</u>
- 7. Pursuant to the Cares Act, Debtor proposes to adjust her post confirmation plan payments by adding a term of 24 months unto the end of her confirmed plan.
- 8. Therefore, Debtor request permission to modify their plan accordingly.

WHEREFORE, Debtor moves that this Honorable Court enter an Order granting Debtor's Motion to Modify Plan Post Confirmation.

Date: April 29, 2021 \s\ Michael D. Sayles

Michael D. Sayles Attorney for Debtor 427 W. Cheltenham Avenue Elkins Park, PA 19027 (215) 635-2270 Midusa1@comcast.net